

# Exhibit L



LAW FIRM OF  
**OMAR T. MOHAMMEDI, LLC**

233 BROADWAY, SUITE 820  
WOOLWORTH BUILDING  
NEW YORK, NY 10279  
PHONE (212) 725-3846  
FACSIMILE (212) 202-7621  
WWW.OTMLAW.COM

OMAR T. MOHAMMEDI, ESQ.  
DIRECT DIAL: (212) 725-3846 x101  
EMAIL: OMOHAMMEDI@OTMLAW.COM

NEW YORK, EIGHTH CIRCUIT  
SECOND CIRCUIT, ALGERIAN BAR  
US COURT ON INTERNATIONAL  
TRADE

March 22, 2018

**VIA ELECTRONIC MAIL**

Sean Carter, Esq.  
Scott Tarbutton, Esq.  
Cozen O'Connor  
One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103  
E-mail: [SCarter1@cozen.com](mailto:SCarter1@cozen.com)  
[STarbutton@cozen.com](mailto:STarbutton@cozen.com)

**RE: In re Terrorist Attacks of September 11, 2001, 03 MDL 1570**

Dear Sean and Scott:

We write in follow up to parties March 19, 2018 meet-and-confer. As mentioned at the meet-and-confer in good faith WAMY withdraws its objection to Plaintiffs' third document request for production as untimely. WAMY will supplement its responses to the third document request shortly.

In the interim, however, based on our conversation you were going to send us a representative list, of chapters Plaintiffs' contend WAMY's responses are insufficient. We discussed those chapters listed in footnote seven of Plaintiffs' memorandum to a limited extent during the meet-and-confer. It is our understanding, however, that you will send us the names of some chapters so that we may check with our client that full disclosure of all responsive documents has been made following a robust search. While we believe this to be the case, we have agreed to make further inquiry with our client along these lines once we receive the list of "test" chapters from you.

We understand that Plaintiffs have identified all document requests for any alleged insufficiency that are at issue, in your letter of March 16, 2018. We believe WAMY has diligently searched for and produced all relevant documents in its possession, custody and control which have been produced to Plaintiffs. Nonetheless in good faith WAMY will undertake another search for the alleged insufficient production.

Also, this will confirm that our client is presently undertaking a review of those specific documents and matters that you contend indicate "missing" documents or attachments as set forth in your memorandum. We will have a response to you on this soon.

In order to provide a thorough and complete response to Plaintiffs' list of chapters, and in order to ensure that the production has been as robust as we believe it has been, we believe we will need to meet with our clients and go through the alleged insufficiencies by listed chapters. We don't think we can accomplish that meeting, get the required information, if any, review it and produce it to Plaintiffs before our March 30, 2018 motion response date. We recommend the parties send a joint letter to the Court as soon as convenient, requesting to put the motion to compel on hold for at least 30- days to enable parties to further narrow the disputed issues as addressed in the meet and confer.

Kindly let us know if Plaintiffs' are amenable to the aforementioned joint letter to the Court.

Sincerely,

/s/ Omar Mohammedi

Omar T. Mohammedi, Esq.

/s/ Fredrick Goetz

Frederick J. Goetz, Esq.